

U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

March 20, 2023

By ECF

Hon. Kenneth M. Karas
United States Courthouse
300 Quarropas Street, Room 533
White Plains, New York 10601

MEMO ENDORSED

Re: *Krandle v. Refuah Health Ctr., Inc.*, 22 CV 4977 (KMK);
Esposito v. Refuah Health Ctr., Inc., 22 CV 5039 (KMK)

Dear Judge Karas:

Before the Court are two actions removed by defendant Refuah Health Center (“Refuah”) from New York Supreme Court. The underlying actions concern the theft of medical and other sensitive personal information in the possession of Refuah. Plaintiffs have filed motions to remand these matters to state court. By order dated February 2, 2023, the Court granted the United States until March 20, 2023, to file a Statement of Interest setting forth its position on whether Refuah meets the requirements of the removal statutes. The Government respectfully requests a three-day extension of this deadline, to March 23, 2023. The request is necessary to allow the Government to complete the final step in the process for obtaining authorization from the U.S. Department of Justice to file the Statement of Interest. We recognize that, when issuing the February 2 Order, the Court stated that no further requests for an extension would be granted. We apologize to the Court for having to seek this three-day extension. We anticipated having the statement completed by today but are requesting the additional time to address an issue which has been raised during the review process.

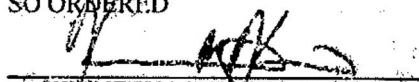
We thank the Court for its consideration of this request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

The Government has until 5pm
on 3/23/2023 to file its Statement
of Interest. There will be no
more extensions for any reason.

SO ORDERED


KENNETH M. KARAS U.S.D.J.

By: /s/ Brandon Cowart
BRANDON H. COWART
Assistant United States Attorney
Telephone: (212) 637-2693
Email: brandon.cowart@usdoj.gov

March 23, 2023

cc: All Parties (by ECF)